

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

WOLFRAM ARNOLD, ERIK  
FROESE, TRACY HAWKINS,  
JOSEPH KILLIAN, LAURA CHAN  
PYTLARZ, and ANDREW  
SCHLAIKJER,

Plaintiffs,

v.

X CORP. f/k/a TWITTER, INC., X  
HOLDINGS CORP. f/k/a X  
HOLDINGS I, INC. and ELON MUSK,

Defendants.

C.A. No. 1:23-cv-528-CFC-CJB

**STIPULATION AND [PROPOSED] ORDER REGARDING TEMPORARY  
STAY AND DEFERRAL OF RULING ON DEFENDANT X CORP. F/K/A  
TWITTER, INC.'S AND X HOLDINGS CORP. F/K/A X HOLDINGS I,  
INC.'S MOTION TO DISMISS AND DEFENDANT ELON MUSK'S  
MOTION TO DISMISS**

Plaintiffs Wolfram Arnold, Erik Froese, Tracy Hawkins, Joseph Killian, Laura Chan Pytlarz, and Andrew Schlaikjer ("Plaintiffs") and Defendants X Corp. f/k/a Twitter, Inc., X Holdings Corp. f/k/a X Holdings I, Inc., and Elon Musk ("Defendants") (Plaintiffs and Defendants shall collectively be referred to as the "Parties"), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, counsel for the Parties have met and conferred and agreed to mediate Plaintiffs' claims;

WHEREAS, the mediation is scheduled to occur on February 7, 2024;

WHEREAS, in service of judicial economy, counsel for the Parties have conferred and agreed to request a temporary stay of this Action, including all currently pending party and third-party discovery deadlines, briefing schedules, court conferences, motion hearings and Court rulings through February 12, 2024; and

WHEREAS, the Parties specifically request that the Court defer ruling on Defendants X Corp. f/k/a Twitter, Inc.'s and X Holdings Corp. f/k/a X Holdings I, Inc.'s pending Motion to Dismiss (D.I. 14-15) and defer ruling on Defendant Elon Musk's pending Motion to Dismiss (D.I. 17-18), until at least February 12, 2024.

NOW, THEREFORE, the Parties stipulate to the following, subject to the Court's approval:

1. This Action shall be stayed through February 12, 2024;
2. All pre-trial deadlines, discovery deadlines, including currently pending party and third-party discovery, briefing schedules, and court conferences shall be continued to dates after February 12, 2024;
3. The Court shall defer ruling on Defendants X Corp. f/k/a Twitter, Inc.'s and X Holdings Corp. f/k/a X Holdings I, Inc.'s pending Motion to Dismiss (D.I. 14-15), until a date on or after February 12, 2024;

4. The Court shall defer ruling on Defendant Elon Musk's pending Motion to Dismiss (D.I. 17-18), until a date on or after February 12, 2024; and
5. The Parties shall file a joint report with the Court on February 12, 2024 updating the Court regarding status.

Dated: December 18, 2023

CHRISTENSEN & DOUGHERTY LLP   MORGAN, LEWIS & BOCKIUS, LLP

/s/ Joseph L. Christensen

Joseph L. Christensen (#5146)  
1000 N. West Street, Suite 1200  
Wilmington, Delaware 19801  
Tel: (302) 212-4330  
joe@christensendougherty.com

*Attorney for Plaintiffs*

/s/ Jody C. Barillare

Jody C. Barillare (#5107)  
1201 N. Market Street, Suite 2201  
Wilmington, Delaware 19801  
302-574-7294  
jody.barillare@morganlewis.com

*Attorney for Defendants*

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
The Hon. Christopher J. Burke